



October 7, 2019

**VIA ECF**

The Honorable Richard F. Boulware, II  
 Lloyd D. George Federal Courthouse  
 333 Las Vegas Blvd. South  
 Las Vegas, NV 89101

**Re: Notice of Exhibits from Phase 2 of the Evidentiary Hearing in *Le et al. v. Zuffa, LLC*, Case No. 2:15-cv-01045-RFB-BNW**

Dear Judge Boulware:

Zuffa, LLC (“Zuffa”) and Plaintiffs (jointly, the “Parties”) have met and conferred regarding the exhibits to be admitted from the second phase of the evidentiary hearing, which included testimony from Professor Alan Manning, Professor Paul Oyer, and Joe Silva.

The Parties agree to admit the following exhibits, which are attached as Exhibits to this letter.

<b>Ex. #</b>	<b>Exhibit identifier</b>	<b>Description</b>
Pls. Ex. 17	PCCX344	ZFL-2677898
Pls. Ex. 18	JCCX8	ZFL-0895314
Pls. Ex. 19	JCCX28	ZUF-00296713
Pls. Ex. 20	PCCX104	ZFL-0977248
Pls. Ex. 21	PCCX255	ZFL-2207629
Pls. Ex. 22	PCCX338	ZFL-2641098
Pls. Ex. 23	PCCX365	ZUF-00085896
Pls. Ex. 24	PCCX391	ZUF-00296703
Zuffa Ex. 9	PCCX685	William M. Boal & Michael R. Ransom, <i>Monopsony in the Labor Market</i> , Journal of Economic Literature (1997)
Zuffa Ex. 10	ZCCX279	Expert Report of Edward E. Leamer, Ph.D., <i>In re High-Tech Employees Antitrust Litig.</i> , Case No. 5:11-cv-02509-LHK, ECF No. 967, dated Oct. 1, 2012
Zuffa Ex. 11	ZCCX214	Exhibit 92 to Zuffa’s Opposition to Plaintiffs’ Motion for Class Certification – Forms of UFC Compensation
Zuffa Ex. 12	ZCCX14	Group of Bates Numbered Documents: ZFL-0456766; ZFL-0456767; ZFL-0460295; ZFL-0818970; ZFL-0822937; ZFL-0823267; ZFL-0876450; ZFL-2534954
Zuffa Ex. 13	JCCX22	Email from T. Long to M. Mersch, Subj: RE: Mats Nilsson (inured???) vs Omari Ahmedov



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Zuffa Ex. 14	ZCCX17	Group of Bates Numbered Documents: ZFL-0819765; ZFL-0822479
Joint Ex. 1	JCCX33	Alan Manning, <i>Monopsony in Motion</i> (Princeton University Press, 2003) <sup>1</sup>

Respectfully yours,

/s/ Stacey K. Grigsby and /s/ Eric L. Cramer

Stacey K. Grigsby & Eric L. Cramer  
*Attorney for Defendant Zuffa, LLC and Plaintiffs*

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<sup>1</sup> The Parties disagree about the rationale for admitting the entirety of Professor Manning's Monopsony in Motion book, which is exhibit JCCX33 (Joint Exhibit 1). If the Court wishes to admit the entirety of Prof. Manning's book, Plaintiffs have no objection as it is by all accounts a leading book on monopsony by one of the world's great experts on the topic. See ECF No. 741, 9/12/19 Hrg. Tr. 5-162:17-24 (Zuffa's expert, Prof. Oyer, identifying Professor Manning and his book "as particularly authoritative on monopsony power"); *see also id.* at 164:12-165:8 (Prof. Oyer testifying that "if [he] really wanted to figure out if, in fact, a particular fighter's marginal revenue product impacted event revenue, [he] would try to get a couple of other labor economists to sit down with me and figure this out; [including] possibly Alan [Manning]"). Plaintiffs would note simply that the only portion of the book introduced at the hearing was an excerpt at pp. 30-31, ECF No. 745, 9/13/19 Hrg. Tr. 6-19:13-24:25, about which Prof. Manning testified, and thus admitting the entire book would not be justified under the ordinary approach of the Parties and the Court to exhibits from the hearing. Zuffa believes that the entire book should be admitted because Professor Oyer testified about the entirety of the book, including: what dependent variable was used in all of the regressions considering compensation as a dependent variable (wage level or equivalent, not wage share), ECF No. 741, 9/12/19 Hrg. Tr. 5-96:10-19; whether Professor Manning ever wrote that he wished he had wage share information (never), *id.* at 5-132:25-133:7; and whether any sports articles cited in this litigation were ever cited in his book (never), *id.* at 5-101:1-7.



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**ATTESTATION OF FILER**

The signatories to this document are myself and Eric Cramer, and I have obtained Mr. Cramer's concurrence to file this document on his behalf.

Dated: October 7, 2019

*/s/ Stacey K. Grigsby*  
Stacey K. Grigsby



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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that the foregoing Notice of Exhibits from Phase 2 of the Evidentiary Hearing was served on October 7, 2019 via the Court's CM/ECF electronic filing system addressed to all parties on the e-service list.

*/s/ Roderick Crawford*  
Roderick Crawford